

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-cr-80044-Rosenberg/Reinhart

8 U.S.C. § 1324(a)(2)(B)(ii)

8 U.S.C. § 1327

8 U.S.C. § 1326(a) & (b)(2)

18 U.S.C. § 982(a)(6)

18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA

vs.

JERMAINE DOMINGO WILLIAMS,
SADIN MIGUEL TINEO SANTANA,
SEBASTIAO CLEUBER BORGES DA CRUZ,
and RAUL ANTONIO MORENO-GARCIA,

Defendants.

FILED BY TM D.C.

Mar 25, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - WPB

INDICTMENT

The Grand Jury charges that:

COUNTS 1-8

Bringing Aliens to the United States for Private Financial Gain
(8 U.S.C. § 1324(a)(2)(B)(ii))

On or about March 13, 2025, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

JERMAINE DOMINGO WILLIAMS,

did knowingly bring, and attempt to bring, an alien, as set forth in Counts 1 through 8 below, to the United States for the purpose of private financial gain, knowing and in reckless disregard of the fact that such alien had not received prior official authorization to come to, enter, and reside in the United States, regardless of any official action which might later be taken with respect to such alien:

<u>Count</u>	<u>Alien</u>
1	SADIN MIGUEL TINEO SANTANA
2	SEBASTIAO CLEUBER BORGES DA CRUZ
3	RAUL ANTONIO MORENO-GARCIA
4	N.B.
5	J.E.
6	S. LNU
7	J.L.
8	R.P.

In violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii).

COUNT 9
Aiding or Assisting Certain Aliens to Enter
(8 U.S.C. § 1327)

On or about March 13, 2025, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

JERMAINE DOMINGO WILLIAMS,

did knowingly aid and assist an alien, Sadin Miguel Tineo Santana, to enter the United States, said alien being inadmissible under Title 8, United States Code, Section 1182(a)(2), as an alien who had been convicted of an aggravated felony.

In violation of Title 8, United States Code, Section 1327 and Title 18, United States Code, Section 2.

COUNT 10
Illegal Reentry by an Aggravated Felon
(8 U.S.C. § 1326(a) and (b)(2))

On or about March 13, 2025, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

SADIN MIGUEL TINEO SANTANA,

an alien, having previously been removed from the United States on or about October 15, 2024, did enter, and attempt to enter, the United States, knowingly and unlawfully, without the Attorney General of the United States or his/her successor, the Secretary of Homeland Security (Title 6, United States Code, Sections 202(3), 202(4), and 557), having expressly consented to such alien's reapplying for admission to the United States, in violation of Title 8, United States Code, Section 1326(a) and (b)(2).

COUNT 11
Illegal Reentry by a Deported Alien
(8 U.S.C. § 1326(a))

On or about March 13, 2025, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

SEBASTIAO CLEUBER BORGES DA CRUZ,

an alien, having previously been removed from the United States on or about March 22, 2011, did enter, and attempt to enter, knowingly and unlawfully, without the Attorney General of the United States or his/her successor, the Secretary of Homeland Security (Title 6, United States Code, Sections 202(3), 202(4), and 557), having expressly consented to such alien's reapplying for admission to the United States, in violation of Title 8, United States Code, Section 1326(a).

COUNT 12
Illegal Reentry by a Deported Alien
(8 U.S.C. § 1326(a))

On or about March 13, 2025, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

RAUL ANTONIO MORENO-GARCIA,

an alien, having previously been removed from the United States on or about October 15, 2024, did enter, and attempt to enter, knowingly and unlawfully, without the Attorney General of the

United States or his/her successor, the Secretary of Homeland Security (Title 6, United States Code, Sections 202(3), 202(4), and 557), having expressly consented to such alien's reapplying for admission to the United States, in violation of Title 8, United States Code, Section 1326(a).

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which the defendant, **JERMAINE DOMINGO WILLIAMS**, has an interest.

2. Upon conviction of a violation of Title 8, United States Code, Section 1324, as alleged in this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6):

- a. any conveyance, including any vessel, vehicle, or aircraft, used in the commission of such offense;
- b. any property, real or personal, that constitutes, or is derived from, or is traceable to any proceeds obtained, directly or indirectly, from the commission of such offense; and
- c. any property, real or personal, that was used to facilitate, or intended to be used to facilitate, the commission of such offense.

3. Upon conviction of a violation of Title 8, United States Code, Section 1327, as alleged in this Indictment, the defendant shall forfeit to the United States any proceeds, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

All pursuant to Title 18, United States Code, Sections 982(a)(6) and 981(a)(1)(C) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL *nn*

FOREPERSON *JP*


for
HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY


JONATHAN R. BAILYN
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.: _____

v.

JERMAINE DOMINGO WILLIAMS,
SADIN MIGUEL TINEO SANTANA,
SEBASTIAO CLEUBER BORGES DA CRUZ,
and RAUL ANTONIO MORENO-GARCIA

Court Division (select one)

Miami Key West FTP
 FTL WPB

CERTIFICATE OF TRIAL ATTORNEY

Superseding Case Information:

New Defendant(s) (Yes or No) _____

Number of New Defendants _____

Total number of new counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the Indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.

2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, 28 U.S.C. §3161.

3. Interpreter: (Yes or No) Yes

List language and/or dialect: Span'sh & Port'gs

4. This case will take 3 days for the parties to try.

5. Please check appropriate category and type of offense listed below:

(Check only one)

I 0 to 5 days
 II 6 to 10 days
 III 11 to 20 days
 IV 21 to 60 days
 V 61 days and over

(Check only one)

Petty
 Minor
 Misdemeanor
 Felony

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes, Judge _____ Case No. _____

7. Has a complaint been filed in this matter? (Yes or No) Yes

If yes, Judge William Matthewman Magistrate Case No. 9:25-mj-08139-WM

8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No

If yes, Judge _____ Case No. _____

9. Defendant(s) in federal custody as of March 13, 2025

10. Defendant(s) in state custody as of _____

11. Rule 20 from the _____ District of _____

12. Is this a potential death penalty case? (Yes or No) No

13. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? (Yes or No) No

14. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No

15. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

16. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

By: Jonathan Baily

Assistant United States Attorney

Court ID No. A5502602

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JERMAINE DOMINGO WILLIAMS

Case No: _____

Counts #: 1-2

Bringing Aliens to the United States for Private Financial Gain

Title 8, United States Code, Section 1324(a)(2)(B)(ii)

* **Max. Term of Imprisonment:** 10 Years' Imprisonment
* **Mandatory Min. Term of Imprisonment (if applicable):** 3 Years' Imprisonment
* **Max. Supervised Release:** 3 Years
* **Max. Fine:** \$250,000

Counts #: 3-8

Bringing Aliens to the United States for Private Financial Gain

Title 8, United States Code, Section 1324(a)(2)(B)(ii)

* **Max. Term of Imprisonment:** 10 Years' Imprisonment
* **Mandatory Min. Term of Imprisonment (if applicable):** 5 Years' Imprisonment
* **Max. Supervised Release:** 3 Years
* **Max. Fine:** \$250,000

Count #: 9

Aiding or Assisting Certain Aliens to Enter

Title 8, United States Code, Section 1327

* **Max. Term of Imprisonment:** 10 Years' Imprisonment
* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
* **Max. Supervised Release:** 3 Years
* **Max. Fine:** \$250,000

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

Defendant's Name: SADIN MIGUEL TINEO SANTANA

Case No: _____

Count #: 10

Illegal Reentry by an Aggravated Felon

Title 8, United States Code, Section 1326(a) and (b)(2)

* Max. Term of Imprisonment: 20 Years' Imprisonment

* Mandatory Min. Term of Imprisonment (if applicable): N/A

* Max. Supervised Release: 3 Years

* Max. Fine: \$250,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

Defendant's Name: SEBASTIAO CLEUBER BORGES DA CRUZ

Case No: _____

Count #: 11

Illegal Reentry by a Deported Alien

Title 8, United States Code, Section 1326(a)

* Max. Term of Imprisonment: 2 Years' Imprisonment
* Mandatory Min. Term of Imprisonment (if applicable): N/A
* Max. Supervised Release: 1 Year
* Max. Fine: \$250,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

Defendant's Name: RAUL ANTONIO MORENO-GARCIA

Case No: _____

Count #: 12

Illegal Reentry by a Deported Alien _____

Title 8, United States Code, Section 1326(a) _____

* **Max. Term of Imprisonment:** 2 Years' Imprisonment

* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

* **Max. Supervised Release:** 1 Year

* **Max. Fine:** \$250,000

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.